

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

1-4

Page 1	Page 3
<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 - - -</p> <p>4 ADA ANGLEMEYER, et al. : CIVIL ACTION</p> <p>5 v. : </p> <p>6 NORTHAMPTON COUNTY : NO. 19-3714</p> <p>7 - - -</p> <p>8 October 1, 2020</p> <p>9 - - -</p> <p>10 Videotape deposition of TROOPER</p> <p>11 PETER DEL GAIZO, taken pursuant to notice, was</p> <p>12 held remotely, commencing at 10:18 a.m., on the</p> <p>13 above date, before Torre Lynn Adams, a Court</p> <p>14 Reporter and Notary Public in the Commonwealth</p> <p>15 of Pennsylvania.</p> <p>16 - - -</p> <p>17</p> <p>18</p> <p>19</p> <p>20 ESQUIRE DEPOSITION SOLUTIONS</p> <p>21 Suite 2600</p> <p>22 1835 Market Street</p> <p>23 Philadelphia, Pennsylvania 19103</p> <p>24 (215) 988-9191</p>	<p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4 Testimony of: TROOPER PETER DEL GAIZO</p> <p>5 By Mr. Zeiger 6, 44</p> <p>6 By Mr. Bradford 43</p> <p>7 - - -</p> <p>8 E X H I B I T S</p> <p>9 - - -</p> <p>10 NO. DESCRIPTION PAGE</p> <p>11 (None)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2</p> <p>3 LEVIN &amp; ZEIGER</p> <p>4 BY: BRIAN ZEIGER, ESQUIRE</p> <p>5 Two Penn Center</p> <p>6 1500 John F. Kennedy Boulevard</p> <p>7 Suite 620</p> <p>8 Philadelphia, Pennsylvania 19102</p> <p>9 (267) 328-5506</p> <p>10 zeiger@levinzeiger.com</p> <p>11 Representing the Plaintiffs</p> <p>12</p> <p>13 OFFICE OF ATTORNEY GENERAL</p> <p>14 BY: KEVIN R. BRADFORD, ESQUIRE</p> <p>15 21 South 12th Street</p> <p>16 2nd Floor</p> <p>17 Philadelphia, Pennsylvania 19103</p> <p>18 (215) 560-2262</p> <p>19 Representing the Defendants</p> <p>20 - - -</p> <p>21 ALSO PRESENT:</p> <p>22 SUMMER MENKEE, Videographer</p> <p>23 - - -</p> <p>24</p>	<p>1 - - -</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 - - -</p> <p>4</p> <p>5 Direction to Witness Not to Answer</p> <p>6 Page Line Page Line Page Line</p> <p>7 None</p> <p>8</p> <p>9</p> <p>10 Request for Production of Documents</p> <p>11 Page Line Page Line Page Line</p> <p>12 None</p> <p>13</p> <p>14</p> <p>15 Stipulations</p> <p>16 Page Line Page Line Page Line</p> <p>17 5 1-6</p> <p>18</p> <p>19</p> <p>20 Question Marked</p> <p>21 Page Line Page Line Page Line</p> <p>22 None</p> <p>23</p> <p>24</p>

SUMMARY  
JUDGMENT  
EXHIBIT  
8

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

5-8

<p style="text-align: right;">Page 5</p> <p>1 - - -</p> <p>2 MR. BRADFORD: Mini and full PDF.</p> <p>3 VIDEO TECHNICIAN: Good morning.</p> <p>4 We're now on the video record.</p> <p>5 The time is 10:18 eastern standard</p> <p>6 time on October 1st, 2020. And this begins the</p> <p>7 videotape deposition of Trooper Del Gaizo taken</p> <p>8 in the matter of Ada Anglemeyer, et al. versus</p> <p>9 Northampton County filed in the United States</p> <p>10 District Court for the Eastern District of</p> <p>11 Pennsylvania. The case number of which is</p> <p>12 19-3714.</p> <p>13 My name is Summer Menkee. I'm</p> <p>14 your videographer today. And we have our court</p> <p>15 reporter, Torre Lynn Adams. We are representing</p> <p>16 Esquire -- Esquire Deposition Solutions.</p> <p>17 And everyone who's not speaking,</p> <p>18 please mute your audio and just remember to</p> <p>19 unmute when you are ready to speak.</p> <p>20 Counsel, go ahead and state your</p> <p>21 name for the record and whom you represent,</p> <p>22 after which our court reporter will swear in the</p> <p>23 witness.</p> <p>24 MR. ZEIGER: Good morning. It's</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. And did your tour of duty that day</p> <p>2 take you to at or near 340 Old Allentown Road in</p> <p>3 Bushkill Township, Northampton County,</p> <p>4 Pennsylvania?</p> <p>5 COURT REPORTER: I'm sorry --</p> <p>6 THE WITNESS: Yes --</p> <p>7 COURT REPORTER: -- sir. Can you</p> <p>8 give me the address again? I beg your pardon.</p> <p>9 MR. ZEIGER: Hi. Good morning.</p> <p>10 How are good?</p> <p>11 COURT REPORTER: Good.</p> <p>12 MR. ZEIGER: I didn't see that was</p> <p>13 you.</p> <p>14 340 Old Allentown Road, Bushkill</p> <p>15 Township, Northampton County, Pennsylvania.</p> <p>16 VIDEO TECHNICIAN: And can</p> <p>17 everybody hear Mr. Zeiger?</p> <p>18 COURT REPORTER: He's a little</p> <p>19 low.</p> <p>20 VIDEO TECHNICIAN: He's the lowest</p> <p>21 of any --</p> <p>22 COURT REPORTER: Yeah, he's a</p> <p>23 little --</p> <p>24 MR. BRADFORD: Yeah. Brian,</p>
<p style="text-align: right;">Page 6</p> <p>1 Brian Zeiger for the plaintiffs.</p> <p>2 MR. BRADFORD: And this is Kevin</p> <p>3 Bradford on behalf of all the current</p> <p>4 defendants.</p> <p>5 - - -</p> <p>6 TROOPER PETER DEL GAIZO, after</p> <p>7 having been duly sworn, was examined and</p> <p>8 testified as follows:</p> <p>9 - - -</p> <p>10 EXAMINATION</p> <p>11 - - -</p> <p>12 BY MR. ZEIGER:</p> <p>13 Q. Hi, Trooper. Good morning. How</p> <p>14 are you?</p> <p>15 A. Good morning, Brian. I'm good.</p> <p>16 How are you doing?</p> <p>17 Q. Good.</p> <p>18 So, do you remember an incident</p> <p>19 from on or about February 23, 2018?</p> <p>20 A. I do, I'm familiar with it.</p> <p>21 Q. And were you working as a</p> <p>22 Pennsylvania State Trooper at that date and</p> <p>23 time?</p> <p>24 A. Yes, sir, I was.</p>	<p style="text-align: right;">Page 8</p> <p>1 you're kind of quiet. I don't know if you can</p> <p>2 get close to --</p> <p>3 MR. ZEIGER: Okay. Is that</p> <p>4 better?</p> <p>5 VIDEO TECHNICIAN: Uh-hum.</p> <p>6 MR. BRADFORD: Yep.</p> <p>7 MR. ZEIGER: Okay. Okay. And so,</p> <p>8 if it happens again, tell me, I might have to</p> <p>9 restart my computer.</p> <p>10 VIDEO TECHNICIAN: And the only</p> <p>11 other option is, because I know leaning into the</p> <p>12 computer can be annoying for like an hour, the</p> <p>13 only other option I've seen people do that works</p> <p>14 really well is keeping their video on, but the</p> <p>15 sound off and -- and then calling in via the</p> <p>16 phone connection for their audio, but that would</p> <p>17 be completely up to you as long as everybody can</p> <p>18 hear you.</p> <p>19 MR. ZEIGER: I've done about 30</p> <p>20 depositions with this computer already with this</p> <p>21 setup and sometimes I just need to restart the</p> <p>22 computer.</p> <p>23 VIDEO TECHNICIAN: Okay. Then</p> <p>24 I'll let you guys troubleshoot that.</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
9-12

<p style="text-align: right;">Page 9</p> <p>1 MR. ZEIGER: So, if you think --</p> <p>2 if people can't hear me, then I will -- hold on</p> <p>3 one second.</p> <p>4 VIDEO TECHNICIAN: We can go off</p> <p>5 the record briefly if you want to --</p> <p>6 MR. ZEIGER: Yes. -can everyone</p> <p>7 hear me now?</p> <p>8 MR. BRADFORD: Ten times better.</p> <p>9 VIDEO TECHNICIAN: Amazing.</p> <p>10 MR. ZEIGER: Yeah, I increased the</p> <p>11 microphone volume. Sorry, Trooper. Let's get</p> <p>12 back to business here.</p> <p>13 Back on the record.</p> <p>14 BY MR. ZEIGER:</p> <p>15 Q. So, Trooper, you remember that</p> <p>16 day?</p> <p>17 A. Yes.</p> <p>18 Q. And you were working as a</p> <p>19 Pennsylvania State Trooper on that day, right?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And did you have an opportunity to</p> <p>22 enter a building?</p> <p>23 A. I did.</p> <p>24 Q. And did you use force when you</p>	<p style="text-align: right;">Page 11</p> <p>1 me here because I'm not the most technologically</p> <p>2 savvy guy in the planet --</p> <p>3 A. Don't worry about it.</p> <p>4 Q. -- as you just witnessed.</p> <p>5 Can you see that on your screen?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Okay. And you see at the bottom</p> <p>8 there's a sticker and it says Del Gaizo -- Del</p> <p>9 Gaizo-1?</p> <p>10 A. Yes.</p> <p>11 Q. Am I pronouncing your name</p> <p>12 correctly?</p> <p>13 A. It's Del Gaizo.</p> <p>14 Q. Okay. And so, do you know what</p> <p>15 this document is?</p> <p>16 Do you want me to blow it up?</p> <p>17 A. No. I see it. That's my callout</p> <p>18 report.</p> <p>19 Q. Okay. And what's a callout record</p> <p>20 report?</p> <p>21 A. It documents basically what the</p> <p>22 --what our actions were during the warrant</p> <p>23 service.</p> <p>24 Q. Okay. And is this your callout</p>
<p style="text-align: right;">Page 10</p> <p>1 entered the building?</p> <p>2 A. I was the breacher.</p> <p>3 Q. Breacher, you were the breacher?</p> <p>4 A. I was the breacher. I was the</p> <p>5 primary breacher.</p> <p>6 Q. Okay. But I mean, after you went</p> <p>7 into the building, did you use force with any</p> <p>8 human beings that were not troopers?</p> <p>9 A. I just grabbed a hold of a woman,</p> <p>10 middle-aged woman.</p> <p>11 Q. Do you think you did anything</p> <p>12 wrong that day in your function as a</p> <p>13 Pennsylvania State Trooper?</p> <p>14 A. No, not at all.</p> <p>15 Q. Okay. So, in regards to the</p> <p>16 breaching, you don't think you did anything</p> <p>17 wrong?</p> <p>18 A. Yes.</p> <p>19 Q. And in regard to dealing with the</p> <p>20 middle-aged woman, you don't think you did</p> <p>21 anything wrong?</p> <p>22 A. No.</p> <p>23 Q. Okay. So, I'm going to pull up a</p> <p>24 document here on a screen share, and bear with</p>	<p style="text-align: right;">Page 12</p> <p>1 report from the case that we're here for today?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And so, I'm just going</p> <p>4 to go -- go -- go through it.</p> <p>5 So, it has the date of activation.</p> <p>6 That means the day that the police work was</p> <p>7 actually done?</p> <p>8 A. Yes, that's the date that CERT was</p> <p>9 requested.</p> <p>10 Q. Okay. And the date of the report</p> <p>11 means that that's the day you typed this up?</p> <p>12 A. Yes.</p> <p>13 Q. And then it has your name. That's</p> <p>14 your name, right?</p> <p>15 A. Yes.</p> <p>16 Q. And then it has the address that</p> <p>17 we're talking about, correct?</p> <p>18 A. That's correct.</p> <p>19 Q. And on the -- the 2-23-18 date, it</p> <p>20 says 04:00. That means that you guys met at</p> <p>21 4:00 a.m. to go over the case?</p> <p>22 A. That's correct.</p> <p>23 Q. And overtime used four hours means</p> <p>24 that you worked four times more than your</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

13-16

<p style="text-align: right;">Page 13</p> <p>1 regular schedule would be in order to be part of</p> <p>2 this job, right?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. And then I'm going to</p> <p>5 scroll down to the typed part here. It says "On</p> <p>6 2-21 at 950 hours, you notified Sergeant Brian</p> <p>7 Roberts via E-mail of this CERT activation."</p> <p>8 What does that mean?</p> <p>9 A. 1950 hours, so when we get</p> <p>10 activated, we have to notify our direct</p> <p>11 supervisor. They could if they wanted to change</p> <p>12 our regular -- regularly scheduled shift to</p> <p>13 reflect straight time, but I -- if you have</p> <p>14 Court or something, you get the overtime.</p> <p>15 Q. Okay.</p> <p>16 A. I'm a patrol trooper. That's my</p> <p>17 general -- CERT is part-time -- part-time team.</p> <p>18 So, my main job is a patrol trooper.</p> <p>19 Q. I understand.</p> <p>20 And the next paragraph says "On</p> <p>21 2-23-18 at 0400, I attended a briefing for this</p> <p>22 warrant."</p> <p>23 What does that mean?</p> <p>24 A. I attended a briefing. It's a</p>	<p style="text-align: right;">Page 15</p> <p>1 residence.</p> <p>2 Q. So, Wysocky was there with you</p> <p>3 then, he was also the primary?</p> <p>4 A. He -- yes, he was -- he was my --</p> <p>5 he's been my assistant. He was the A breacher</p> <p>6 they call it.</p> <p>7 Q. Okay. And so, what did you</p> <p>8 actually do to breach the property?</p> <p>9 A. I had a ram, and I hit the door</p> <p>10 with the ram and breached it.</p> <p>11 Q. By yourself?</p> <p>12 A. Opened it.</p> <p>13 Q. By yourself?</p> <p>14 A. Broke it open.</p> <p>15 Q. By yourself?</p> <p>16 A. Yes, by myself.</p> <p>17 Q. So, basically, the ram is like a</p> <p>18 long cylinder that has like a handle on it?</p> <p>19 A. Has two handles on it, that's</p> <p>20 correct. It's like a 30 foot --</p> <p>21 Q. And you use some kind of force,</p> <p>22 and through physics, that ram hits the door and</p> <p>23 the idea is to pop it open?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 14</p> <p>1 synopsis of the investigation, the local</p> <p>2 investigators. It's a synopsis of what their</p> <p>3 findings were, why CERT was activated and then</p> <p>4 to go through safety concerns and -- and</p> <p>5 people's criminal history, and who's supposed to</p> <p>6 be at the house, the layout of the house, the</p> <p>7 threats at the house and everyone's particular</p> <p>8 assignments.</p> <p>9 Q. Okay. And it says "I was assigned</p> <p>10 to primary breacher with Trooper Wysocky."</p> <p>11 Am I saying his name right?</p> <p>12 A. Yes, you actually are.</p> <p>13 Q. Okay. And -- and what does that</p> <p>14 mean primary breacher?</p> <p>15 A. So, every -- every -- every</p> <p>16 residence or house or structure, we assign</p> <p>17 sides. And I was assigned the primary breacher</p> <p>18 of the one side. So, the primary bulk of the</p> <p>19 team was going to go through the door that I was</p> <p>20 breaching.</p> <p>21 There's also a secondary --</p> <p>22 there's also a primary and secretary. So, if</p> <p>23 the primary fails, there's a secondary breach</p> <p>24 with other members to make entry into the</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. And did you do that in this case?</p> <p>2 A. I did.</p> <p>3 Q. And did it work?</p> <p>4 A. Yes, it did.</p> <p>5 Q. And where was Wysocky when you</p> <p>6 were doing that?</p> <p>7 A. Right next to me. He was holding</p> <p>8 screen door so it didn't interfere with my</p> <p>9 swing.</p> <p>10 Q. After you do it, what do you do</p> <p>11 with the ram?</p> <p>12 A. I hold on to it.</p> <p>13 Q. As you go through the house?</p> <p>14 A. I hold onto it in my left arm,</p> <p>15 yeah, as I go through the house, in case someone</p> <p>16 else needs to -- in case we run into an issue</p> <p>17 inside and we need to breach the door inside. I</p> <p>18 don't have to run outside and waste time, I have</p> <p>19 it on me.</p> <p>20 But usually if I'm going through a</p> <p>21 room, I would just leave it right next to me and</p> <p>22 then deal with whatever I have to deal with</p> <p>23 inside that room.</p> <p>24 Q. And how much does it weigh?</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
17-20

<p style="text-align: right;">Page 17</p> <p>1 A. 30 pounds.</p> <p>2 Q. Okay. Again -- and -- and you</p> <p>3 carry that in with you as you go up steps or</p> <p>4 down steps or whatever?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And so, as you popped the</p> <p>7 door open, where is Wysocky? He's holding that</p> <p>8 screen door?</p> <p>9 A. Yes.</p> <p>10 Q. And then are you the first guy in</p> <p>11 or does someone go in ahead of you?</p> <p>12 A. The whole team goes in, me and</p> <p>13 Matt were like the last two in.</p> <p>14 Q. Sure.</p> <p>15 Because once you pop it open, the</p> <p>16 guys with the shields go in first and then you</p> <p>17 follow them?</p> <p>18 A. That's -- that's the idea, that</p> <p>19 they have the protection, so you know, no one</p> <p>20 gets injured. And I had my hands full with the</p> <p>21 ram, so --</p> <p>22 Q. Exactly. And you don't have your</p> <p>23 service revolver or your Glock or whatever it</p> <p>24 is?</p>	<p style="text-align: right;">Page 19</p> <p>1 A. No, not that I recall.</p> <p>2 Q. Understood.</p> <p>3 "And Trooper Wysocky and I secured</p> <p>4 one male and one female who were in the front</p> <p>5 bedroom."</p> <p>6 Do you remember who they were?</p> <p>7 A. I remember they -- you know, as</p> <p>8 I'm looking through the -- the documents that</p> <p>9 were presented to me of the pictures of the</p> <p>10 people, I can almost be certain that it was</p> <p>11 Renee Kluska, and I don't know if I'm</p> <p>12 pronouncing their name correctly, apologize and</p> <p>13 Joseph Kluska.</p> <p>14 Q. Okay. I think they pronounce it</p> <p>15 Kluska, but that's okay.</p> <p>16 A. Okay.</p> <p>17 Q. And so, I'm just going to make a</p> <p>18 statement that Renee claims that she was not</p> <p>19 injured by you or Wysocky, but Joe claims he was</p> <p>20 injured by you or Wysocky. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. And so, that's part of the reason</p> <p>23 why we're here today. Okay.</p> <p>24 So, I'm also going to put on the</p>
<p style="text-align: right;">Page 18</p> <p>1 A. Not at that time.</p> <p>2 Q. Because you have the ram?</p> <p>3 A. Correct.</p> <p>4 Q. Right.</p> <p>5 "Upon my arrival to the warrant</p> <p>6 scene, I exited the utility van and made my way</p> <p>7 up to the residence with Trooper Wysocky. And</p> <p>8 then checked the main door to see if it was</p> <p>9 locked and it was. I then waited for</p> <p>10 announcements to start and announced State</p> <p>11 Police, search warrant while knocking. After a</p> <p>12 period of time without a response from within</p> <p>13 the residence, I breached the door. Once the</p> <p>14 door was open, the team made their way into the</p> <p>15 residence. Trooper Wysocky and I made our way</p> <p>16 into the residence and helped secure it with</p> <p>17 other members."</p> <p>18 So that basically caught up to all</p> <p>19 your previous answers?</p> <p>20 A. Yes.</p> <p>21 Q. -- is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. Did anything else happen during</p> <p>24 that period of time that's not in your report?</p>	<p style="text-align: right;">Page 20</p> <p>1 record that they're married?</p> <p>2 A. Okay.</p> <p>3 Q. Okay.</p> <p>4 So -- so, it says "Trooper Wysocky</p> <p>5 and I secured one male and female who were in</p> <p>6 the front bedroom."</p> <p>7 And you've identified them. Did</p> <p>8 you physically touch either of them with your</p> <p>9 hands or your body in any way?</p> <p>10 A. Yes. Renee.</p> <p>11 Q. Renee. Okay.</p> <p>12 And then when you touched Renee,</p> <p>13 what part of your body touched what part of her</p> <p>14 body?</p> <p>15 A. My hands and her shoulders.</p> <p>16 Q. Okay. And what -- and what --</p> <p>17 A. Pardon me. And her hands, her</p> <p>18 wrists.</p> <p>19 Q. What did you do to secure her?</p> <p>20 A. I asked her to get out of bed --</p> <p>21 well, I didn't ask. I told her to get out of</p> <p>22 bed and she was -- she was complying. She</p> <p>23 complied. So, then I grabbed a hold of her</p> <p>24 shoulders, assisted her in getting out of bed,</p>



TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

21-24

<p style="text-align: right;">Page 21</p> <p>1 turned her around and then grabbed her hands and</p> <p>2 flex cuffed her.</p> <p>3 Q. Was she arrested for anything?</p> <p>4 A. She was just detained. Everyone</p> <p>5 gets detained in the house for safety concerns,</p> <p>6 for the safety -- until the house is clear. And</p> <p>7 then the investigators, the local investigator,</p> <p>8 state investigator, whoever is the primary</p> <p>9 investigator, will come in and determine</p> <p>10 criminal charges if any are applicable.</p> <p>11 Q. And to your knowledge, was she</p> <p>12 charged with anything?</p> <p>13 A. That I have no idea. I don't</p> <p>14 know.</p> <p>15 Q. Okay. And did you have any</p> <p>16 contact with Joe Kluska?</p> <p>17 A. Not that I remember. I don't</p> <p>18 think so.</p> <p>19 Q. Okay. So, did you see Wysocky</p> <p>20 have any contact with Joe Kluska?</p> <p>21 A. I did.</p> <p>22 Q. Okay. And can you describe that,</p> <p>23 please?</p> <p>24 A. Sure.</p>	<p style="text-align: right;">Page 23</p> <p>1 obviously -- if you're laying in the bed, she</p> <p>2 was on the right portion of the bed. He was on</p> <p>3 the left portion of the bed. I went left to</p> <p>4 deal with her and he went right.</p> <p>5 I know it sounds confusing, but --</p> <p>6 Q. No, it's actually not. I totally</p> <p>7 understand what you're saying. Good</p> <p>8 description, I think.</p> <p>9 And what was Renee wearing?</p> <p>10 A. That I don't remember.</p> <p>11 Q. What was Joe wearing?</p> <p>12 A. I don't remember that either.</p> <p>13 Q. They were both asleep, though,</p> <p>14 when you entered the room, correct?</p> <p>15 A. As far as I know, yes, they were</p> <p>16 in bed under the covers, I don't know if they</p> <p>17 were asleep or awake.</p> <p>18 Q. Okay. But it was like 6:00 a.m.</p> <p>19 at this point, right?</p> <p>20 A. Yes.</p> <p>21 Q. And they're on a different floor</p> <p>22 then the entry point, correct?</p> <p>23 A. They were on the floor that I</p> <p>24 entered.</p>
<p style="text-align: right;">Page 22</p> <p>1 So, while I was dealing with</p> <p>2 Renee, I heard Trooper Wysocky, you know, giving</p> <p>3 Joseph commands to get out of the bed, which,</p> <p>4 you know, then they started -- Joe was having a</p> <p>5 argument, yelling back and forth. And then</p> <p>6 Trooper Wysocky grabbed him and pulled him out</p> <p>7 of bed. And when they went to the ground next</p> <p>8 to the bed, that's when Trooper Wysocky rolled</p> <p>9 him over, flex cuffed him, stood him up and sat</p> <p>10 him in the chair.</p> <p>11 Q. Did you hear Kluska, Joe Kluska</p> <p>12 say anything?</p> <p>13 A. I did not. I just heard the</p> <p>14 arguing back and forth, Trooper Wysocky giving</p> <p>15 him commands and Kluska not complying. Once he</p> <p>16 was flex cuffed, that was it.</p> <p>17 Q. And flex cuffs are like zip -- zip</p> <p>18 ties?</p> <p>19 A. Yeah, zip ties -- pretty much a</p> <p>20 thick zip tie, yes.</p> <p>21 Q. And when you and Wysocky went in</p> <p>22 the room, did you go in together?</p> <p>23 A. We went in together, yes. I went</p> <p>24 in first. I went to the left. So, she was</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Oh, they were on the main floor</p> <p>2 then?</p> <p>3 A. Yes.</p> <p>4 MR. BRADFORD: Can I jump in real</p> <p>5 quick just to make sure we're clear?</p> <p>6 So, you were on the upper floor;</p> <p>7 is that fair to say that?</p> <p>8 THE WITNESS: Yeah. Yeah. I was</p> <p>9 the upper floor.</p> <p>10 MR. BRADFORD: Okay.</p> <p>11 THE WITNESS: That's correct.</p> <p>12 MR. ZEIGER: Okay. I think that's</p> <p>13 a good point, Kevin. That's why I'm confused.</p> <p>14 BY MR. ZEIGER:</p> <p>15 Q. So, the floor that you breached on</p> <p>16 is the same floor that they were on, which is</p> <p>17 also called the upper floor?</p> <p>18 A. Yes.</p> <p>19 Q. Got it. Okay.</p> <p>20 And did -- did anyone get any</p> <p>21 medical attention that you -- that you saw, Joe</p> <p>22 or Renee?</p> <p>23 A. No, not -- not in my --</p> <p>24 Q. And Joe didn't say anything else</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
25-28

<p style="text-align: right;">Page 25</p> <p>1 to you?</p> <p>2 A. I didn't hear Joe say anything,</p> <p>3 no.</p> <p>4 Q. Okay. And did you recover</p> <p>5 anything in the room?</p> <p>6 A. We did not. There was a handgun</p> <p>7 on the headboard of their bedroom, but that's</p> <p>8 the only thing that I saw in plain view.</p> <p>9 Q. As far as you know, neither Joe</p> <p>10 nor Renee were arrested for anything to do with</p> <p>11 that gun, right?</p> <p>12 A. Not that I know. It's not illegal</p> <p>13 to have a gun in your house unless you're a</p> <p>14 felon.</p> <p>15 Q. Right.</p> <p>16 And next, it says "After the</p> <p>17 residence was cleared and secured, it was turned</p> <p>18 over to the investigators."</p> <p>19 Who were the investigators?</p> <p>20 A. The Northampton County Drug Task</p> <p>21 Force. I believe it was Detective Michael</p> <p>22 Hunstrum (ph), Hunstrum. He was the primary</p> <p>23 investigator.</p> <p>24 Q. "I then left the scene with the</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. Okay. I'm going to scroll up.</p> <p>2 This says "Defendant Del Gaizo's response to</p> <p>3 Plaintiff's Interrogatories."</p> <p>4 Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. Okay. I'm going to scroll down</p> <p>7 for a little bit here. Go all the way to the</p> <p>8 bottom here.</p> <p>9 Okay. This is a document called a</p> <p>10 Verification. And it means that the answers</p> <p>11 contained are truthful and there's a date and</p> <p>12 signature.</p> <p>13 Is that your signature?</p> <p>14 A. That is.</p> <p>15 Q. And did you answer the questions</p> <p>16 on here or did your lawyer do it?</p> <p>17 A. I did it.</p> <p>18 Q. Okay. And then your lawyer typed</p> <p>19 them up for you?</p> <p>20 A. Yeah, I believe so.</p> <p>21 MR. BRADFORD: Would you say it's</p> <p>22 a collaboration between you and your lawyer?</p> <p>23 MR. ZEIGER: I don't want to --</p> <p>24 I'm trying to avoid the objection of</p>
<p style="text-align: right;">Page 26</p> <p>1 team back to the AP." What does AP mean?</p> <p>2 A. AP is the assembly point. So,</p> <p>3 every -- every warrant we go on, there's</p> <p>4 assembly point. It's usually the closest state</p> <p>5 barracks to the warrant location. And that's</p> <p>6 where we debrief, go over things that went</p> <p>7 right, things that we can improve on and so on.</p> <p>8 Q. And after that, you were</p> <p>9 dismissed, correct?</p> <p>10 A. That's correct.</p> <p>11 Q. And all you had on you that day</p> <p>12 was a Glock 21 and the ram?</p> <p>13 A. That's -- that's -- yes, that's</p> <p>14 all I had.</p> <p>15 Q. Okay. And by 7:30 a.m., you were</p> <p>16 dismissed?</p> <p>17 A. That's correct.</p> <p>18 Q. I'm going to unshare this and go</p> <p>19 to another document.</p> <p>20 A. Okay.</p> <p>21 Q. Can you see that?</p> <p>22 A. Yes.</p> <p>23 Q. That says Del Gaizo-2, correct?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 attorney/client privilege.</p> <p>2 MR. BRADFORD: Yeah. I know. I</p> <p>3 know. Yeah. The verification says he verified</p> <p>4 the factual information in there. I typed it</p> <p>5 up, of course; provided the information.</p> <p>6 MR. ZEIGER: You'd be surprised,</p> <p>7 there's some lawyers that do it for their client</p> <p>8 and then --</p> <p>9 MR. BRADFORD: Without talking to</p> <p>10 them?</p> <p>11 MR. ZEIGER: No comment.</p> <p>12 BY MR. ZEIGER:</p> <p>13 Q. Okay. Give me a second. I'm</p> <p>14 going to go to a specific page here.</p> <p>15 A. Sure.</p> <p>16 Q. Okay. Before we got this, was</p> <p>17 there a trooper there who is like an</p> <p>18 African-American guy who was like rather large?</p> <p>19 A. Trooper King you're referring to?</p> <p>20 The dude is humongous. He's stacked. Yeah,</p> <p>21 he's a big guy. If that's the guy you're</p> <p>22 talking about, he's a very big guy.</p> <p>23 Q. Do you -- did you have any</p> <p>24 interaction with him on this job?</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
29-32

<p style="text-align: right;">Page 29</p> <p>1 A. Not that I remember.</p> <p>2 Q. Did you have any interaction with</p> <p>3 an older lady in this case?</p> <p>4 A. An old woman?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. Did you see an ambulance get</p> <p>8 called for an old woman?</p> <p>9 A. I did not.</p> <p>10 Q. Okay. Did you see King interact</p> <p>11 with an older woman at any point in time in this</p> <p>12 case?</p> <p>13 A. No, not at all. I think they were</p> <p>14 on a -- a different floor.</p> <p>15 Q. Did you -- did you ever hear King</p> <p>16 say anything to Painter like this is too much or</p> <p>17 this is carried away or, you know, calm down a</p> <p>18 little bit or something to that nature?</p> <p>19 A. No.</p> <p>20 Q. Okay. All right. I'm on Number 6</p> <p>21 here. Okay.</p> <p>22 Can you see Number 6 on your</p> <p>23 screen?</p> <p>24 A. Yes, I can.</p>	<p style="text-align: right;">Page 31</p> <p>1 There's only one female plaintiff in this</p> <p>2 lawsuit. So, it's not her is what he's saying.</p> <p>3 BY MR. ZEIGER:</p> <p>4 Q. Okay. I'll read it again, because</p> <p>5 that's my fault.</p> <p>6 "The woman was too young to be the</p> <p>7 only female plaintiff."</p> <p>8 So, what did you mean by that?</p> <p>9 A. I guess the plaintiff is that</p> <p>10 older woman, and she's clearly not an older --</p> <p>11 that older of a woman.</p> <p>12 Q. Okay. "Responding party is</p> <p>13 without knowledge or information sufficient to</p> <p>14 form a belief as to whether the male, who was</p> <p>15 secured by Wysocky, is one of the plaintiffs</p> <p>16 given the limited description of the plaintiffs</p> <p>17 provided in the Complaint."</p> <p>18 You -- you believe now today?</p> <p>19 A. Yes. So, I mean, I -- I wasn't</p> <p>20 able to view the pictures or anything like that,</p> <p>21 you know, but now, yes, I'm fairly certain that</p> <p>22 Joe was the -- you know, the other person in</p> <p>23 that room.</p> <p>24 Q. And -- and -- and Joe Kluska is</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. I'll blow it up. I'm going to</p> <p>2 blow it up.</p> <p>3 A. Okay. That's better.</p> <p>4 Q. Okay. You can see Number 6?</p> <p>5 A. Yes.</p> <p>6 Q. This is a question about force.</p> <p>7 I'm going to read the answer. Okay. And then</p> <p>8 we're going to go through it just like we did on</p> <p>9 that -- on that CERT report. Okay.</p> <p>10 "As explained in his callout</p> <p>11 report, responding party located a white male</p> <p>12 and while female he found together in a front</p> <p>13 bedroom on the upper floor of the house."</p> <p>14 That's about the same answer you</p> <p>15 gave previously, correct?</p> <p>16 A. That's correct.</p> <p>17 Q. "Responding party flexed cuff the</p> <p>18 female only."</p> <p>19 That's Renee, we agreed on that,</p> <p>20 correct.</p> <p>21 A. Yes, that's correct.</p> <p>22 Q. "The woman was too young to be the</p> <p>23 only female." I'm not sure what that means.</p> <p>24 MR. BRADFORD: Female plaintiff.</p>	<p style="text-align: right;">Page 32</p> <p>1 that plaintiff?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Next, it says "Upon</p> <p>4 information and belief, neither the male nor the</p> <p>5 female had any injuries or require any medical</p> <p>6 treatment."</p> <p>7 Is that right?</p> <p>8 A. Yes, that's correct.</p> <p>9 Q. So if I told you today that --</p> <p>10 that Joe had shoulder surgery as a result of his</p> <p>11 interaction with you and Wysocky, your response</p> <p>12 would be that you have no response to that?</p> <p>13 A. Right, I have no response to that.</p> <p>14 Q. "All individuals were to be</p> <p>15 secured as part of the process of securing the</p> <p>16 premises pursuant to the warrant, which is what</p> <p>17 happened."</p> <p>18 That's consistent with your</p> <p>19 previous answers, right?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Moving down.</p> <p>22 Number 8 talks about arrests. And</p> <p>23 this answer says that you did not participate in</p> <p>24 making any arrests, right?</p>



TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

33-36

<p style="text-align: right;">Page 33</p> <p>1 A. That's correct. We didn't arrest 2 anyone, we just detained everyone in the 3 residence. 4 Q. Okay. Are you aware that this was 5 an investigation for methamphetamine operation, 6 like a lab? 7 MR. BRADFORD: Objection to form. 8 THE WITNESS: I am. 9 BY MR. ZEIGER: 10 Q. And you didn't find anything 11 related to any kind of methamphetamine or 12 methamphetamine lab in this residence, did you? 13 A. We don't search the residence, 14 just secure everyone involved. So, I -- I 15 didn't find anything. 16 Q. Right. And in plain view, you 17 didn't see anything, right? 18 A. Just the handgun. 19 Q. But you said the handgun's not 20 illegal, so that's not really -- 21 A. Yes, no, I didn't see any 22 methamphetamine or meth-making materials. 23 Q. Okay. And if Joe was arrested for 24 something, you have no idea what that's about,</p>	<p style="text-align: right;">Page 35</p> <p>1 man. 2 THE WITNESS: Prevents a lot of 3 this stuff. 4 BY MR. ZEIGER: 5 Q. Right. No, I get it. 6 So, are you in a union? 7 A. I am, yes. 8 Q. Have you ever filed a grievance 9 with your union about not having a body cam? 10 A. No. We have do have cameras, 11 patrol cameras. We patrol around in our cars 12 and we wear a mic, but we don't have body cams. 13 I assume it's because of the expense of 5,000 14 troopers to have them. 15 Q. I would argue that there's certain 16 undercover narcotics officers that would object 17 to them is what -- 18 A. I -- 19 Q. -- I don't think it's the expense. 20 If you get them, everyone else has to get them 21 -- pardon me -- and then everyone would have to 22 get them. 23 And the narcotics officers would 24 lose their minds.</p>
<p style="text-align: right;">Page 34</p> <p>1 right? 2 A. I have no clue. 3 Q. Okay. And as far as you know, the 4 operation that was conducted was just for 5 methamphetamine or a meth lab, right? 6 A. It was -- yes, it was a drug 7 warrant, search warrant. 8 Q. But that's the drug that was 9 mentioned in the warrant, correct? 10 A. Correct. 11 Q. There was no video, correct? 12 A. Like body cam video -- 13 Q. Correct? 14 A. -- you mean? 15 No. 16 Q. You were not wearing a body cam, 17 correct? 18 A. We don't have them, no. 19 Q. Have you ever complained that you 20 want one? 21 A. It would be helpful. I haven't 22 complained. 23 Q. I agree it would be helpful to -- 24 MR. BRADFORD: I'm for it, too,</p>	<p style="text-align: right;">Page 36</p> <p>1 All right. Let's go back to this 2 case. 3 Other than the document that we 4 already went over, that was Del Gaizo-1 one, are 5 you aware if you filled out any other paperwork 6 regarding this incident? 7 A. That's it. 8 Q. I'm going to keep going here. 9 Number 11 here, I asked you about 10 other law enforcement. And so basically, this 11 is consistent with your previous answer. I 12 understand that that's Northampton Drug Task 13 Force contacted the Pennsylvania State Police to 14 request a CERT unit because they didn't have the 15 manpower to take down this property, to execute 16 the warrant; is that right? 17 A. That's correct. 18 Q. And that's consistent with your 19 answer in Number 11 here, correct? 20 A. Yes. 21 Q. Number 13, "Responding parties 22 exact role specified in this callout report and 23 the warrant service plan was set by CERT 24 leadership. Upon information and belief, the</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
37-40

<p style="text-align: right;">Page 37</p> <p>1 search warrant specifically included three</p> <p>2 structures; the residence, nearby garage and a</p> <p>3 trailer. Responding party does not recall any</p> <p>4 other structures that were not secured."</p> <p>5 So, this is a big parcel of land,</p> <p>6 correct?</p> <p>7 A. Yes, it was.</p> <p>8 Q. Right. And so, there's multiple</p> <p>9 buildings on the parcel of land, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And to your knowledge, one of them</p> <p>12 is -- is called like a garage. I see that's</p> <p>13 actually written here in your answer. You use</p> <p>14 the word garage, right?</p> <p>15 A. Correct.</p> <p>16 Q. And by garage, that's more like an</p> <p>17 auto body garage kind of idea, right?</p> <p>18 A. I wasn't in the garage, so I have</p> <p>19 no idea. I just recalled a garage. That was a</p> <p>20 separate team that was responsible for securing</p> <p>21 that -- that building.</p> <p>22 Q. And are you aware that the folks</p> <p>23 down at the Northampton County investigation, of</p> <p>24 the drug investigation stated that the drug</p>	<p style="text-align: right;">Page 39</p> <p>1 or alleged meth in the garage, I'm sure it's</p> <p>2 other places, so, you know.</p> <p>3 Q. But based on information from the</p> <p>4 Northampton County Drug Task Force, they didn't</p> <p>5 give in you any information that any narcotics</p> <p>6 activities were taking place in the house?</p> <p>7 A. No, not that I remember.</p> <p>8 Q. Okay. I'm going to keep going.</p> <p>9 And the next, Question 14, is</p> <p>10 about evidence of narcotics. And your answer</p> <p>11 was "Responding party did not discover any</p> <p>12 suspected methamphetamine while securing the</p> <p>13 property. Responding party does not know what</p> <p>14 each of the other CERT members discovered."</p> <p>15 Is that correct?</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. Number 16 has to do with</p> <p>18 firearm arms. And just skipping down, you --</p> <p>19 you were given information that some of the --</p> <p>20 some of the parties may have a firearm; is that</p> <p>21 right?</p> <p>22 A. That's correct.</p> <p>23 Q. Were you given any information</p> <p>24 that there was any kind of illegality related to</p>
<p style="text-align: right;">Page 38</p> <p>1 operation was being conducted in that garage?</p> <p>2 MR. BRADFORD: Object to the form.</p> <p>3 You can answer. You can answer,</p> <p>4 Pete.</p> <p>5 THE WITNESS: Oh. As far as I</p> <p>6 know. I only know during the brief that four</p> <p>7 controlled guys were brought out of that</p> <p>8 so-called garage. That's all that I know.</p> <p>9 BY MR. ZEIGER:</p> <p>10 Q. Understood.</p> <p>11 So, when you went into the house,</p> <p>12 you had no knowledge that there was anything</p> <p>13 related to the manufacturing or delivering of</p> <p>14 methamphetamine in the house, right?</p> <p>15 A. I don't really understand, like</p> <p>16 did you think I -- did I think that there was</p> <p>17 meth inside the house, is that --</p> <p>18 Q. No. Well, I mean, you can answer</p> <p>19 that question as well.</p> <p>20 I mean, did you think there was</p> <p>21 meth inside the house?</p> <p>22 A. You know, we're always taught, you</p> <p>23 know if you discover a gun, there's probably</p> <p>24 another one. So, if there's meth in the garage,</p>	<p style="text-align: right;">Page 40</p> <p>1 the firearms?</p> <p>2 A. There were some people that --</p> <p>3 that were potentially were going to be in the</p> <p>4 structure that weren't allowed to possess any</p> <p>5 weapons, but there were some that could. So,</p> <p>6 that's really all the information I knew.</p> <p>7 And there was a lot of weapons up</p> <p>8 to a 50-caliber rifle.</p> <p>9 Q. Understood.</p> <p>10 But you didn't arrest anyone for</p> <p>11 any kind of illegal weapons charge, did you?</p> <p>12 A. We are not responsible for any of</p> <p>13 that. That's the local investigators. And like</p> <p>14 I said, I have no idea if they did that or not.</p> <p>15 Q. Understood.</p> <p>16 So, the answer is no, you did not</p> <p>17 arrest anybody, right.</p> <p>18 A. Did not, sorry.</p> <p>19 Q. No problem.</p> <p>20 And you did not observe anything</p> <p>21 regarding any firearms that you believe was</p> <p>22 illegal, that if you're the person who was in</p> <p>23 charge of --</p> <p>24 A. I lost you on the end.</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
41-44

<p style="text-align: right;">Page 41</p> <p>1 Q. My bad. Oh, I did it, too. We're</p> <p>2 even now.</p> <p>3 You didn't observe anybody -- you</p> <p>4 didn't observe anyone commit any violations of</p> <p>5 the Uniform Firearm Act that if you were the</p> <p>6 person making the decisions regarding who to</p> <p>7 arrest, that you would have said yes, arrest?</p> <p>8 A. No.</p> <p>9 Q. Okay. Scrolling down.</p> <p>10 MR. BRADFORD: Brian, Matt Wysocky</p> <p>11 is going to log in soon. So, I don't know</p> <p>12 how -- if you can move quickly on this or we can</p> <p>13 bump him up if you want. I'm just letting me</p> <p>14 know.</p> <p>15 MR. ZEIGER: I beg your pardon,</p> <p>16 Kevin, but what's Matt's scheduled time?</p> <p>17 MR. BRADFORD: He's currently</p> <p>18 noon, but he's just hanging out. He's a party,</p> <p>19 so he can jump in.</p> <p>20 BY MR. ZEIGER:</p> <p>21 Q. Trooper, did you observe anyone</p> <p>22 else do anything wrong?</p> <p>23 A. No, I didn't notice anyone do</p> <p>24 anything wrong.</p>	<p style="text-align: right;">Page 43</p> <p>1 chair. That's it. I didn't hear him say</p> <p>2 anything about an injury. I'm sure Matt -- Matt</p> <p>3 may have, but I did not.</p> <p>4 Q. Okay. And you -- you don't -- you</p> <p>5 don't think you did anything wrong? I asked you</p> <p>6 that already, I just want to be sure. You don't</p> <p>7 think you did anything wrong?</p> <p>8 A. Yes, I don't think I did.</p> <p>9 Q. And if Joe injured his shoulder,</p> <p>10 you don't accept any responsibility for anything</p> <p>11 dealing with that shoulder?</p> <p>12 MR. BRADFORD: Objection to form.</p> <p>13 THE WITNESS: No.</p> <p>14 MR. ZEIGER: Okay. I have nothing</p> <p>15 further. Thank you and be safe.</p> <p>16 - - -</p> <p>17 EXAMINATION</p> <p>18 - - -</p> <p>19 BY MR. BRADFORD:</p> <p>20 Q. Quick question, the handgun that</p> <p>21 was on the headboard?</p> <p>22 A. Yes.</p> <p>23 Q. Did you observe that before or</p> <p>24 after the Kluska were flex cuffed?</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. Okay. And if -- if Joe Kluska</p> <p>2 says he was injured, you don't have any</p> <p>3 explanation for how he might have been injured?</p> <p>4 A. No, I have no -- can you repeat?</p> <p>5 I'm sorry.</p> <p>6 Q. If Joe Kluska says he injured his</p> <p>7 shoulder as a result -- or shoulders, plural, as</p> <p>8 a result of the way you and Wysocky treated him,</p> <p>9 do you have any explanation as to how he could</p> <p>10 have received that injury?</p> <p>11 MR. BRADFORD: Objection to form.</p> <p>12 You can answer.</p> <p>13 THE WITNESS: I would assume being</p> <p>14 flex cuffed behind the back, you know, if you</p> <p>15 have shoulder issue, it could probably</p> <p>16 exacerbate that injury, but it is what it is.</p> <p>17 You have to be secured.</p> <p>18 BY MR. ZEIGER:</p> <p>19 Q. Understood.</p> <p>20 So, you didn't -- you didn't see</p> <p>21 any -- anything in regard to that? You didn't</p> <p>22 observe that personally, correct?</p> <p>23 A. I just saw with him with his hands</p> <p>24 behind his back flex cuffed sitting in the</p>	<p style="text-align: right;">Page 44</p> <p>1 A. It was -- it was before. When I</p> <p>2 entered the room, there was -- obviously, there</p> <p>3 were the two body -- I just saw two figures in</p> <p>4 the bed. And then we say the -- I saw the</p> <p>5 handgun on the headboard.</p> <p>6 Q. Okay. There was definitely a</p> <p>7 handgun that was within arm's reach of the</p> <p>8 individuals in the bed?</p> <p>9 A. Absolutely. It was actually right</p> <p>10 between them -- above them, it was above them,</p> <p>11 but between them.</p> <p>12 MR. BRADFORD: Okay. Okay.</p> <p>13 That's it.</p> <p>14 - - -</p> <p>15 EXAMINATION</p> <p>16 - - -</p> <p>17 BY MR. ZEIGER:</p> <p>18 Q. Let me just follow up.</p> <p>19 You never saw Renee or Joe motion</p> <p>20 towards the gun, did you?</p> <p>21 A. No.</p> <p>22 Q. Okay. And as far as you know,</p> <p>23 neither Joe nor Renee were arrested for anything</p> <p>24 related to that gun, were they?</p>

TROOPER PETER DEL GAIZO  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
45-48

Page 45	Page 47
<p>1 A. Not to my knowledge, no.</p> <p>2 MR. ZEIGER: All right. I don't</p> <p>3 have anything further.</p> <p>4 Are you finished?</p> <p>5 MR. BRADFORD: Yeah, no. I'm</p> <p>6 good.</p> <p>7 MR. ZEIGER: So, I'm --</p> <p>8 VIDEO TECHNICIAN: Are you guys</p> <p>9 ready to conclude -- do the conclusion to be</p> <p>10 done for Dr. -- the doctor --</p> <p>11 MR. BRADFORD: Yeah, Dr. Del</p> <p>12 Gaizo, right.</p> <p>13 THE WITNESS: That's what I should</p> <p>14 have done.</p> <p>15 VIDEO TECHNICIAN: Police work,</p> <p>16 right. Okay.</p> <p>17 So, everybody's in agreement to</p> <p>18 conclude?</p> <p>19 MR. BRADFORD: Yes.</p> <p>20 VIDEO TECHNICIAN: Okay. This</p> <p>21 concludes the videoconference deposition of</p> <p>22 Trooper Del Gaizo. We just ask that all</p> <p>23 participants stay connected briefly to provide</p> <p>24 your transcript and video order.</p>	<p>1 CERTIFICATE</p> <p>2</p> <p>3 I HEREBY CERTIFY that the witness</p> <p>4 was duly sworn by me and that the deposition is</p> <p>5 a true record of the testimony given by the</p> <p>6 witness.</p> <p>7</p> <p>8 <i>Torre Lynn Adams</i></p> <p>9</p> <p>10 Torre Lynn Adams,</p> <p>11 Court Reporter and Notary Public</p> <p>12 Dated: October 15, 2020</p> <p>13</p> <p>14</p> <p>15</p> <p>16 (The foregoing certification of</p> <p>17 this transcript does not apply to any</p> <p>18 reproduction of the same by any means, unless</p> <p>19 under the direct control and/or supervision of</p> <p>20 the certifying reporter.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>1 And I don't know how you guys want</p> <p>2 to do this? Do you want to do this at the very</p> <p>3 end of all three troopers or do you want to do</p> <p>4 that each time?</p> <p>5 MR. BRADFORD: Yeah, we can do it</p> <p>6 at the end of all three, because that's the same</p> <p>7 -- it's going to be the same.</p> <p>8 VIDEO TECHNICIAN: If you want</p> <p>9 one, you want them all?</p> <p>10 MR. BRADFORD: Right. Right.</p> <p>11 Exactly. I think.</p> <p>12 VIDEO TECHNICIAN: All right,</p> <p>13 gentlemen. Then we are going off the video</p> <p>14 record at October 1st, 2020 at 10:54 a.m.</p> <p>15 (Witness excused.)</p> <p>16 (Deposition concluded at 10:54</p> <p>17 a.m.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 LAWYER'S NOTES</p> <p>2 PAGE LINE</p> <p>3 _____</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p>